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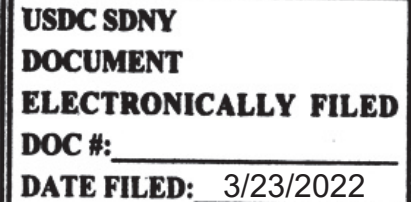
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March 23, 2022

Via ECF

The Honorable Robert W. Lehrburger, U.S.M.J.
United States District Court
Southern District of New York
500 Pearl Street, Room 1960
New York, NY 10007

Re: *Santos v. Nuve Miguel Corp. et al.*
Case No. 1:21-cv-01335 (JPO)(RWL)

Dear Judge Lehrburger:

We are counsel to Plaintiff in the above-referenced case. We write, jointly with counsel for Defendants, to respectfully request an adjournment of all conferences and deadlines in light of the parties intention to participate in a private Class Mediation with Mr. Martin Scheinman, Esq., a nationally recognized mediator.

Therefore, in light of the pending private Class Mediation, the parties respectfully request an adjournment of the pre-settlement conference call scheduled for 11:00 a.m. on April 1, 2022 [Dkt. No. 87], the settlement conference scheduled for 9:30 a.m. on April 27, 2022 [Dkt. No. 88], the briefing schedule for Plaintiff's Rule 23 Class Certification Motion [Dkt. No. 85] and all other conferences and discovery deadlines sine die.

Notwithstanding the proposed mediation, Defendants dispute the existence of any class or that this action is a "Class" action and reserve all objections concerning same.

The parties will update the Court once a mediation date has been confirmed among the parties.

We thank Your Honor for considering this matter.

Respectfully submitted,

/s/ C.K. Lee

C.K. Lee, Esq.

cc: all parties via ECF

The Court applauds the parties' efforts to mediate this dispute. The April 1, 2022 pre-settlement conference call and the April 27, 2022 settlement conference are canceled. The case is STAYED pending mediation or until the Court orders otherwise. The parties shall file a joint status letter every 30 days, and not later than seven days after completion of mediation.

SO ORDERED:

3/23/2022

HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE